

New Hampshire Special Education Program Approval Evaluation Report

Odyssey School and Pace Program

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Note: *It should be noted that suggestions are not considered corrective actions and therefore are given as technical assistance. The private facility is not mandated to implement them.*

New Hampshire Special Education Program Approval Summary Evaluation Report

Odyssey School

I. INTRODUCTION:

A New Hampshire Special Education Program Approval visit was conducted at Odyssey School, including the PACE Program. The review team met on December 12 - 13, 2000 in order to review the status of special education services provided to eligible students.

Activities related to this evaluation included the close review of all the application materials submitted by the school and a check of teaching certifications of special education personnel. In addition, interviews were held with the Education Director, administrators, special education teachers, regular education teachers, counselors, parents and related service personnel as availability permitted. The team also randomly inspected and reviewed student files from the school, including the file of a student who falls under the James O' Consent Decree. Throughout the visit, the team had full cooperation from the school personnel, which was greatly appreciated.

The report that you are about to read represents the consensus of all the members of the visiting team. Please keep in mind that this is a "report for exception", meaning that only exceptions to the NH State Standards and Federal regulations have been addressed. If a component is not mentioned, that does not mean that the team did not review it; it just means that there were no exceptions to the regulations found in that particular area.

II. STATUS OF PREVIOUS ON-SITE: *February 10, 11, 1998*

Based on a review of the previous program approval report that included the team findings of the February 10-11, 1998 visit to Odyssey School and Pace Program, it was the consensus of the current visiting team that a number of issues that were identified during the 1998 visit still need to be addressed.

The area of qualified staff has been strengthened with two programs presently having staff certified in general special education. The Odyssey School includes staff certified in elementary and business education and staff also have access to content area consultants from neighboring Winnacunnet High School in the areas of Reading, Physical Education, English, Family and Consumer Science, and Business Education. This connection is also to the resources available at Winnacunnet High School and represents a positive move toward providing students with access to the general curriculum. The Pace Program will need to become part of the consultative model and either join the Odyssey School staff or develop consultative relationships with other local certified educators. Further consultation in the areas of emotional handicaps, mathematics, science, art, music and library/media services should be sought by both programs.

Odyssey School has been working on the development of a curriculum for the past several years. At the time of this visit, there is still no finalized curriculum that reflects a connection to the NH Curriculum Frameworks in all content areas. This continues to be an area of concern.

The previous visit also identified several areas of noncompliance regarding special education policies and procedures, particularly related to the admission process and the amending of student IEP's. Issues related to these areas were identified again during this visit. There continues to be a need for a well designed and executed special education process. Records reviewed revealed an ongoing lack of documentation and practice related to a number of procedures.

III. ISSUES OF SIGNIFICANCE:

Odyssey School has had a significant turnover in staff this school year as five out of the six teachers are new. This was also true for the previous school year. Such high rate of staff turnover results in a need to continuously provide orientation, mentoring and professional development in all aspects of the school's work. The staff presently employed by Odyssey School are enthusiastic and dedicated to the work they are charged with however, they are also new to the programs and in several cases, new to the field of education. This presents a particular concern when the student population served includes students with complex and serious educational and emotional needs. Finding and retaining qualified and talented staff is a critical issue in the success of any school, and certainly represents a difficulty for private schools in New Hampshire at this time of teacher shortages. However, the Odyssey School administration should focus on the needs of their staff for support, information, supervision and time to plan and collaborate. They should make every effort to create meaningful opportunities for these, and other such activities to occur.

The completion of a curriculum that reflects the school's experiential approach to instruction and is connected to the NH Curriculum Frameworks is critical at this point. The staff require a curriculum, as well as related materials and equipment, in order to provide an adequate education to Odyssey School students. Further, it is presently not clear which courses available to students will lead toward the completion of a high school diploma.

Student records did not consistently include the required documentation including: evaluations, written prior notice, placement decisions, and progress reporting for both the Pace and Odyssey School programs. While the students are often placed at each program with little or no advance notice making it difficult to quickly gather information and to meet with the sending district, parents/guardians or surrogate parents, the same state and federal regulations regarding the provision of services to students with disabilities apply. There is evidence of attempts to gather relevant information, but these attempts were often unsuccessful.

Another issue of significance is found in the area of IEP development. Interviews and review of student records reveals a lack of well designed and amended IEP's that reflect the current placement and are connected to the curriculum. Further, there is a lack of evidence that IEP and placement team meetings are held with all necessary team members present. The development of clear and consistently practiced policies and procedures for this and all aspects of service delivery to students with disabilities must be put into place immediately.

The facility used by the Pace Program is well maintained and attractive. The space available for instruction is limited and appeared to be at or above maximum capacity. However, the atmosphere and climate found in the Pace Program building, including the residence, was pleasant and comfortable.

The facility used by the Odyssey School program was a concern to the visiting team. The space designated for instruction is small and overcrowded. It would be difficult to provide a full array of curriculum activities for the number of students attending the program in the space provided. The building as a whole does not appear to be well maintained or attractive. It is unclear if there is a plan to improve learning spaces or to provide additional areas for staff meetings, group activities, etc.

The visiting team appreciated the hospitality and willingness of the staff and students to discuss the issues and general aspects of the programs visited.

IV. COMMENDATIONS, CITATIONS AND SUGGESTIONS:

PROGRAM VISITED: Odyssey School

COMENDATIONS:

- Students appeared to be on task and working in classes.
- Staff appear to be dedicated and enthusiastic about their roles and their students.
- Students take some ownership of their school environment (student work is evident).
- The aftercare services are a good idea.
- The special education director is available to parents.
- Parents report satisfaction with the positive communication from the school.
- The family involvement component is good.
- The community outreach activities are an asset.
- The consultant model in place appears to be effective.
- The substance abuse services/groups are beneficial.

CITATIONS: (in numerical order)

Ed.1109.03 Team Composition

No record of team members present at IEP meeting. Unable to determine if team composition is appropriate. No documentation of LEA representative.

Ed.1109.06 No documentation of representative from Odyssey School at IEP meeting

Ed.1109.04(a-g) Notice of IEP Meeting

CFR300.300.504(a)(2) No evidence of documentation of 10-day notice of IEP meeting. No evidence that parents are given procedural safeguards at the notice of each IEP meeting. No evidence of record of the attempts made to arrange a mutually agreed time and place in cases where parents cannot or do not attend IEP meeting.

Ed.1109.01(a)(b)(c)(g)(h)(i)(l)(n) IEP Development

CFR300.347(a)(7)ii No evidence of: parental input; present levels of performance,
CFR300.347 (a)(5)I consideration of most recent evaluation results, consideration of NHEIAP
CFR300.347(a)(4) results; measurable goals with benchmarks or objectives; extent to which child will spend time in the regular education class; transition statement; length of school day and school year; individuals or providers responsible for implementing; LEA representative at meeting or how parents will be informed of their child's progress toward the annual goals.

Ed.1109.11 IEP Progress

CFR300.347(a)(7)i No evidence of regular and systematic monitoring of the IEP; unclear if parents are informed of child's progress on IEP annual goals; progress reports do not show the extent to which it is sufficient to achieve the goals by the end of the year.

Ed.1133.06(b)(d) Mid year and annual evaluations of progress relative to the IEP are not conducted.

Ed.1111.01 Extended School Year

No evidence that Extended School Year was considered.

V. COMMENDATIONS, CITATIONS AND SUGGESTIONS: Continued

PROGRAM VISITED: Odyssey School

Ed.1123.04 Confidentiality

CFR300.572(d) There is no public listing of the names and positions of employees who have access to personally identifiable information.

Ed.1133.05 Program Requirements

Counselor was unaware of students IEP; was unaware of equipment and materials necessary to implement. Teacher stated that materials and equipment was lacking for the implementation of student IEP.

Ed.1133.07 Behavior Management

Teacher was unaware of written policies and procedures relative to Behavior Management.

Ed.1119.03 Curriculum

There is no complete curriculum that aligns with the NH Curriculum Frameworks.

SUGGESTIONS:

- Professional development opportunities should be frequent and ongoing throughout the school year. Particular efforts should be made to support and inform all staff in all aspects of the required policies and procedures related to the New Hampshire standards and federal regulations for the provision of services to students with educational disabilities.
- New staff should have a well designed mentoring and support system in place throughout their first year, and continued as needed after that.
- Staff should be provided time to meet and plan during the school day so that curriculum can become integrated and support to students is consistent and clearly communicated.
- An inventory of present equipment and materials, including computer hardware and software, should be taken. A long range plan for the purchase of necessary equipment and materials is strongly recommended. Curriculum materials should be relevant and current. Supplies should be available to staff. Technology should be current.
- Provide staff with the opportunity to visit other private programs to seek ideas for the implementation of a comprehensive high school curriculum and related programming for the Odyssey School students.
- The instructional space is inadequate and in need of improvements. There is little space to provide a full array of curriculum related activities and little space for confidential meeting or conversations.

VI. COMMENDATIONS, CITATIONS AND SUGGESTIONS:

PROGRAM VISITED: PACE Program

Commendations:

- The overall facility has a nice “homey” feel to it. The building is clean, with warm and inviting colors and decorations. The classroom provides a nice learning environment.
- The teacher’s enthusiasm is evident and is commended.
- The consistency and dedication of Pace Program staff in the quality of the programs and the interaction with students is very positive.
- The interaction between staff and students regarding student progress and staff expectations is extremely clear.
- The teacher’s use of outside/community resources (library/ media services, etc.) is very good.
- The Case Manager system appears to work well, as does the clear connection between residential and educational staff.
- Transitioning students in and out of the Pace Program is well planned and executed.
- The program “binders” provide good documentation of the Pace Program.
- The daily “3 Positives” from each shift and staff are a great idea.

CITATIONS:

Ed.1123.14, Ed.1123.04
CFR300.563

Confidentiality & Procedural Safeguards

Records do not contain a Record of Disclosure. Unable to determine if Annual notice of Rights/Procedural Safeguards were provided to parents with each notice of IEP meeting.

Ed.1109.01(a-m)
CFR300.347

IEP Components

The IEP’s reviewed were incomplete. Missing components included: measurable annual goals with benchmarks or objectives; statement of special education and related services provided to the child; projected dates and duration of services, length of school year and school day, objective criteria and evaluation procedures and schedules on at least an annual basis; individuals responsible for implementing; statement of parties assuming financial responsibility, transition planning.

Ed.1109.11
CFR300.347(a)(7)i

IEP Progress

There is no evidence of regular and systematic monitoring of the IEP. Unable to determine if parents are informed of child’s progress toward annual goals.

Ed.1107.08

Learning Disability files

Evaluation information regarding student’s learning disability is missing.

Ed.1109.03

Placement

No evidence of placement decision, including team composition. Documentation regarding the placement procedure was not evident. Unable to determine correct team composition.

VII. COMMENDATIONS, CITATIONS AND SUGGESTIONS: Continued

PROGRAM VISITED: PACE Program

Other Federal Requirements for IEP's

CFR300.347(a)(4) Explanation of the extent to which child will not participate with non-disabled children in regular classes not evident.

CFR300.347 Statewide assessments of student achievement (all aspects of assessments as it relates to student) not included.

SUGGESTIONS:

- Begin faxing request for student records to sending districts. Ask records to be faxed immediately. Use certified letter if requesting by mail.
- Create a checklist for each document required in student records. Keep a list of information as it is received.
- Students IEP's should be easily available to instructional staff. Suggest keeping copy in classroom files.
- Consider ways to connect the thematic units to the NH Curriculum Frameworks.
- Include Pace staff in ongoing professional development opportunities with the Odyssey School staff to insure full understanding of all state and federal requirements for the provision of services to students with disabilities.

ADDENDUM

JAMES O. MONITORING PROGRAM

Odyssey School

Student File Review

Case Study Document

Reimbursement Claim Form

Case Study Addendum Form

<p style="text-align: center;">ADDENDUM JAMES O. MONITORING PROGRAM</p>

Odyssey School

CITATIONS:

<u>Ed1113.01</u>	No evidence of a vocational evaluation in student record.
<u>Ed1123.04</u>	File does not contain record of disclosure.
<u>Ed.1123.05</u>	Unable to determine if annual notification of rights were offered to parents.
<u>Ed.1109.01(b)</u>	Annual goals not written in measurable terms in IEP.
<u>Ed.1109.01(d)</u>	Expectation of student for regular class participation not included in IEP.
<u>Ed.1109.01(f)</u>	Statement of related services, including transpiration not included in IEP
<u>Ed.1109.01(i)</u>	Appropriate objective evaluation criteria, procedures and schedules not included in IEP.
<u>Ed.1109.01(l)(m)</u>	Transition planning not completed.
<u>Ed.1109.01(n)</u>	Signatures of appropriate individuals not completed on IEP.
<u>Ed.1109.03</u>	Unable to determine who attended the IEP meeting or if team composition was appropriate according to state and federal requirements.
<u>Ed.1109.11</u>	No evidence of regular and systematic monitoring of IEP.
<u>Ed.1111.01</u>	Not clear if Extended School year was considered by 4/30 or 60 days before starting.

SUGGESTIONS:

All requirements of IDEA '97 and the NH State Standards disabilities must be met for all students with educational disabilities. The administration must implement clear policies and procedures to ensure that all requirements are met and that students are afforded their full educational rights. In order to accomplish this the administration may want to secure the services of a consultant skilled in the administration of special education programs who could provide the structure and ongoing training necessary for all staff so that correct procedures are guaranteed.